

**THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civ. No. 19-cv-08655(LGS)(GWG)

DECLARATION OF NICHOLAS HARTEAU

I, Nicholas Harteau, hereby declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. In May 2017, Google hired me as a Technical Director in the Office of the CTO (hereinafter “Technical Director”) at a Level 9. I worked in Google’s New York City office from May 2017 until I left Google in May 2020.

2. After starting at Google, I took a leave of absence, and thus only worked approximately 4.5 months in 2017.

3. As a Technical Director in OCTO, I reported to Will Grannis, until I changed roles and became a Software Engineering (“SWE”) Director in September 2018. After changing roles in September 2018, I remained on the Technical Director ladder as a Level 9 until I left Google in May 2020.

4. The Technical Director role consists of three categories of job responsibilities, often referred to as “pillars”: 1) customer engagement; 2) engineering; and 3) evangelism.

5. Google first hired me and the other Technical Directors as Individual Contributors with no direct reports.

6. During the time I worked as a Technical Director, I had the opportunity to observe Ms. Rowe's work and the work of other Technical Directors. I and other Technical Directors reported to Will Grannis, and we collaborated and participated in team meetings together.

7. Among the Technical Directors with whom I worked was Evren Eryurek, Jonathan Donaldson, Ben Wilson, and Paul Strong.

8. I enjoyed working with Ms. Rowe and found her to be credible, knowledgeable, and competent in terms of her cloud expertise as it relates to the financial services industry.

9. While some Technical Directors had industry specific experience and focused on particular sectors and others were generalists, all Technical Directors performed the same sort of work regardless of whether they were industry specialties or generalists. Technical Directors collaborated with and covered for each other across industry sectors. Technical Directors all operated at a senior-level and were self-directed. From a team perspective, Ms. Rowe, Mr. Eryurek, Mr. Donaldson, Mr. Wilson, Mr. Strong, and I were all considered equals.

10. Ms. Rowe specialized in the financial services industry and I had some focus in the startup industry. Although our work focused on different industries, our actual work as Technical Directors was very similar. We both met and worked with Google customers, collaborated with Google engineering teams, and engaged in evangelism.

11. While I was in OCTO, Google did not disclose to me whether my fellow Technical Directors, outside my direct reports, were leveled at Level 8 or Level 9.

12. I did not know Ms. Rowe's level while working at Google, but I assumed she was a Level 9.

13. From what I observed, Ms. Rowe performed at the same level as me and other Technical Directors, including Evren Eryurek and Paul Strong.

14. While in OCTO, I understood Ms. Rowe and I to be similarly qualified for the Technical Director position. In fact, I believed her experience and qualifications to be more aligned with other Technical Directors, as she, unlike me, specialized in an industry, worked her way up at a major institution, and had a more traditional educational background associated with the expectations of a Director-level role at Google.

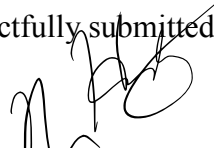
15. In or around August 2018, my designation changed from an Individual Contributor to a People Manager. As a People Manager, my substantive work as a Technical Director, which comprised the majority of my work, did not change, but a minority of my time was spent managing a team of approximately 4-6 individuals.

16. My compensation did not change when I became a People Manager, and my understanding is that Google does not distinguish between Individual Contributors and People Managers in setting compensation for Technical Directors.

17. Both the Technical Director position and the SWE Director position are considered engineering (“Eng”) roles within Google.

Dated: December 2, 2021
New York, New York

Respectfully submitted,

By: 

Nicholas Harteau